

FILED

APR 04 2012


CLERK

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF
AMERICA,

Plaintiff,

vs.

CARL CAMPBELL, aka "Nutty
Boy,"

Defendant.

CR 12-40039

INDICTMENT

Sex Trafficking by Force, Fraud, and
Coercion; Interstate Transportation for
Prostitution

18 U.S.C. §§ 2(a), 2(b), 1591(a)(1),
1591(a)(2), 1591(b)(1), 2422

The Grand Jury charges:

COUNT ONE

(Sex Trafficking By Force, Fraud, or Coercion)

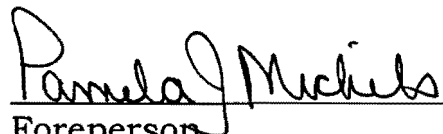
Beginning on or about August 1, 2010, and continuing through on or about July 31, 2011, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Carl Campbell, aka "Nutty Boy," did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, to-wit: M.A., whose identity is known to the Grand Jury, knowing and recklessly disregarding that means of force, threats of force, fraud, and coercion would be used to cause M.A. to engage in a commercial sex act, and did benefit, financially and by

receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), 1591(b)(1), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT TWO
(Interstate Transportation for Prostitution)

Beginning on or about August 1, 2010, and continuing through on or about July 31, 2011, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Carl Campbell, aka "Nutty Boy," did knowingly persuade, induce, entice, and coerce an individual, to-wit: M.A., whose identity is known to the Grand Jury, to travel in interstate commerce to engage in prostitution, and attempted to do so, in violation of 18 U.S.C. § 2422.

A TRUE BILL:


Foreperson

BRENDAN V. JOHNSON
UNITED STATES ATTORNEY

By: 